

## APPLICANT PRIVACY NOTICE

*Last updated: [December 15, 2025]*

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

Privacy and transparency are important to Walter P. Moore and Associates, Inc. We created this Applicant Privacy Notice, so you know how and when we collect, use, share and transfer Personal Information (defined below) as a result of, and in connection with your application to work with us (whether as an employee, worker or contractor). It makes you aware of how and why your Personal Information will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

When this Privacy Notice mentions "**WPM**", "**we**", "**us**" or "**our**", it refers to Walter P. Moore and Associates, Inc., and the applicable subsidiary mentioned below.

Our parent company, Walter P. Moore and Associates, Inc is joint controller of your Personal Information with the subsidiary, that you have made an application to, as listed below. As joint controllers, Walter P. Moore and Associates, Inc and the relevant subsidiary are both responsible for how your Personal Information is collected and used.

If you live in	then the controller of your Personal Information is
the United Kingdom	Walter P Moore Limited

Where relevant, our local recruiting entity identified to you, will also be a controller for your Personal Information meaning they will also be responsible for deciding how your Personal Information is held and used.

This Privacy Notice is provided in accordance with the California Consumer Privacy Act, the California Privacy Rights Act, the UK General Data Protection Regulation, the EU General Data Protection Regulation, and other applicable federal, state, and international laws.

This Privacy Notice should be read in conjunction with similar notices given to you, related to other WPM activities.

### WHAT IS PERSONAL INFORMATION

"**Personal Information**" (also referred to as 'personal data') means any information relating to an identified or identifiable living individual. We may collect the following Personal Information about you in connection with your application to work with us.

Please note that some broad categories below are marked 'YES' because a small amount of that Personal Information is collected.

Category	Examples	Collected
<b>A. Identifiers.</b>	real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, national insurance number, driver's license number, passport number, or other similar identifiers.	YES

Category	Examples	Collected
<b>B. Personal Information categories listed in the California Customer Records statute (including Cal. Civ. Code § 1798.80(e)).</b>	Name, signature, Social Security number, National Insurance Number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card (or other national identity card / government-issued ID) number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	YES
<b>C. Sensitive Personal Information categories listed in the California Customer Records statute (including Cal. Civ. Code 1798.140(ae)).</b>	Social Security number, National Insurance Number driver's license, state identification card (or other national identity card / government-issued ID), passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to the account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, contents of mail, email, and text messages, genetic data, biometric information, health information or sexual orientation. Some personal information included in this category may overlap with other categories.	YES
<b>D. Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, 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, genetic information (including familial genetic information).	YES
<b>E. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
<b>F. Biometric information.</b>	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
<b>G. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
<b>H. Geolocation data.</b>	Physical location or movements.	NO
<b>I. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
<b>J. Professional or employment-related information.</b>	Current or past job history or performance evaluations.	YES
<b>K. Non-public education information (including per the</b>	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,	YES

Category	Examples	Collected
<b>Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</b>	student identification codes, student financial information, or student disciplinary records.	
<b>L. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
<b>M. Benefits Related Information</b>	Health information, beneficiary information, retirement information, fitness/weight loss habits, application for, participation in and purchasing habits regarding any Company-sponsored benefits programs, biometric testing information, insurance program information and any other information related to benefits provided, sought or available to an employee during his or her employment.	YES

## HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect Personal Information about applicants from the following sources:

- you, the applicant;
- your named referees, from whom we obtain a standard reference; and
- the following data from third parties is from a publicly accessible source: results of social media searches such as LinkedIn.

## WHAT HAPPENS IF YOU DO NOT PROVIDE CERTAIN PERSONAL INFORMATION?

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

## HOW WE USE YOUR PERSONAL INFORMATION

We will use the Personal Information we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out reference checks;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

Having received your CV/Resume, covering letter and your application form (as applicable), we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references before confirming your appointment.

In addition to the above, while we will not sell your Personal Information or Sensitive Personal Information, we may use, or disclose it for customary human resources, personnel, and our management purposes, including to facilitate the employment relationship with WPM, and to comply with applicable state and federal law requiring prospective employers to maintain certain records. We

will not collect additional categories of information or use the Personal Information for materially different, unrelated, or incompatible purposes without providing notice.

We will retain Personal Information only for as long as reasonably necessary for the above stated business purposes.

## **WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

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WPM does not sell any Personal Information including Personal Information and Sensitive Personal Information under CCPA to any outside organization. We only disclose or share your Personal Information including Personal Information and Sensitive Personal Information under CCPA to third parties as reasonably necessary to carry out the permitted uses described in this Privacy Notice.

We may disclose your Personal Information to members of our corporate group including, without limitation, for the following reasons: in order to run global processes, carry out groupwide reporting, or take decisions about hiring or promotion.

It may be necessary from time to time for us to disclose your Personal Information, including Personal Information under CCPA to third parties or agents, including without limitation to the following:

- third parties or agents of clients to assist in the administration, processing and management of certain activities pertaining to applicants including travel and expense management service providers;
- individuals or companies employed by WPM to carry out specific services, functions or consultancy work and other financial institutions;
- relatives or legal representatives of applicants;
- regulatory bodies to whom we are obliged or required to disclose information including Workplace Relations Commission, Courts and Court-appointed persons;
- relevant Government departments and agencies; and
- other support service providers necessary to support the organisation in the services listed.

We will inform you in advance if we intend to further process or disclose your Personal Information for a purpose other than the purposes set out above. We take all reasonable steps, as required by law, to ensure the safety, privacy and integrity of such data and information and, where appropriate, enter into contracts with such third parties to protect the privacy and integrity of such data and any information supplied.

## **SECURITY AND STORAGE**

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Access to Personal Information (including sensitive information) in both electronic and paper form is restricted to members of the HR Team and employees who have a legitimate and justifiable reason to view such Personal Information.

## **YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION**

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As an applicant you will have certain rights with regard to your Personal Information. The rights that apply will depend on which country you are employed in. Below we have set out the rights that apply to US applicants. If you are an EU/UK applicant please see the [EU and UK Applicants](#) section of this Privacy Notice for rights that apply.

### California Applicant Rights

If you are a Californian applicant, applying from January 1, 2023, you have the right to:

- know what Personal Information is being collected;
- request to access your Personal Information;
- know and limit what Sensitive Personal Information is sold or shared and to whom;
- request that we delete your Personal Information;
- request to correct inaccurate Personal Information; and
- the right to opt out of automated decision-making technology.

To exercise these rights please contact [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com), using "California Privacy" in the subject line.

### **EU AND UK APPLICANTS**

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If you are an EU or UK Applicant, this section applies to you.

#### **Legal grounds for processing**

If you are a UK or EU applicant, we will only process your Personal Information for the purposes set out above, to the extent necessary:

- In order to decide whether to enter into a **contract** of employment or engagement with you.
- For our **legitimate business interests**. This includes to decide whether to appoint you to the role, since it would be beneficial to our business to appoint applicants to open roles. Please note that where this basis applies, we will consider the risks to you as an individual as against the legitimate interest of the data controller.

#### **Automated decision making**

If you are a UK or EU applicant, you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

#### **Special Categories of Personal Information**

Certain Personal Information is regarded as "special category" and require higher levels of protection. We need to have further justification for collecting, storing and using this type of data. If we use any special category information about you, we may rely one or more of the legal grounds above, along with any additional requirements set out in applicable data protection and employment law.

- We will use information about your health and disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. Data that WPM uses for these purposes will be collected on an anonymised basis. Applicants are entirely free to decide whether or not to provide such information and your application will not be affected either way.

We will only process Personal Information relating to an applicant's criminal convictions or involvement in criminal proceedings when permitted by law, or where provided voluntarily by an applicant.

Sometimes we may also need to use this type of information if it is necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, where you have already made the information public, or for reasons of substantial public interest.

### **International transfers**

If you are a UK or EU applicant, due to the global nature of our business, your Personal Information will be disclosed to WPM entities outside of the United Kingdom ("UK") or the European Economic Area ("EEA"), including in the United States. It may also be processed by our employees or suppliers operating outside the UK or EEA.

We provide adequate protection for the transfer of Personal Information to countries outside of the UK or the EEA, including relying on a country-wide [adequacy decision](#) (where a country offers substantially the same protection as UK and/or EU data protection laws, as applicable) or through a series of intercompany agreements based on the Standard Contractual Clauses authorized under applicable UK and EU law. You are entitled to obtain a copy of these agreements by contacting the Legal department using [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) and please use "EU/UK Privacy" in the subject line.

### **Data retention**

If you are a UK or EU applicant, we will retain Personal Information only for as long as reasonably necessary for the above stated business purposes (including for the purposes of satisfying any legal, accounting, or reporting requirements).

In some circumstances we may anonymise your Personal Information so that you are no longer identifiable, in which case we may use such information without further notice to you.

### **Successful applicants**

If your application for employment or engagement is successful, personal data gathered during the recruitment process will be transferred to our HR management system and retained during your employment in accordance with our employee privacy notice.

### **Unsuccessful applicants**

If your application for employment or engagement is unsuccessful, we will hold your data on file for a period after the end of the relevant recruitment process to the extent necessary to enable us to comply with any legal obligations or for the exercise or defence of legal claims (subject to any applicable legal or regulatory obligations to retain such information for a longer period).

It is likely that we will wish to retain your data for an extended period on the basis that a further opportunity may arise in future and we may wish to consider you for that. After the initial period outlined in the first paragraph in this section has expired, you can request at any time that your personal data be securely destroyed in accordance with applicable laws and regulations.

In the event that any court actions or other legal proceedings are pending or impending, personal data will be deleted after termination of the court action or legal proceeding as appropriate.

## **Applicant rights**

If you are a UK or EU applicant, you may have certain rights in relation to your Personal Information, such as to:

- Access a copy of your Personal Information held by us.
- Object to processing of your data where our legal basis for processing your data is our legitimate interests.
- Request correction of your Personal Information if it is inaccurate or incomplete.
- Request erasure of your Personal Information in certain circumstances.
- Restrict our use of your Personal Information in certain circumstances.
- Request that your provided Personal Information be moved to a third party.
- To withdraw consent (only if you have provided your consent and wish to withdraw it). If you withdraw your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal reason for continuing to use the data.

We may ask you for further information in order to confirm your identity before we provide the information requested or otherwise comply with your request.

Where lawfully permitted, we may deny or restrict fulfilment of your request in some cases, such as when the granting of access or correction rights will impose a burden on us to provide such access or correction that is disproportionate to the risk to your privacy, where access to your data places another individual's privacy rights at risk, or the continued processing of your data is necessary to comply with a legal obligation or for the exercise or defense of legal claims.

WPM and the local subsidiary mentioned at the top of this Notice (if applicable) are both responsible as joint controllers for compliance with GDPR and this notice, and you may exercise the above rights by contacting us at [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) and please use "EU/UK Privacy" in the subject line. They will respond as soon as practicable and no later than one month after receipt of your request. They may request proof of identification to verify your request.

## **Complaints**

If you have any concerns about our data processing practices, you have the right to lodge a complaint with a data protection supervisory authority.

- If you are a UK applicant, you have the right to lodge a complaint with the UK Information Commissioner's Office. You can visit their website at [www.ico.org.uk](http://www.ico.org.uk).
- If you are an EU applicant, you have the right to lodge a complaint with your [local data protection authority](#).

## **CONTACT INFORMATION**

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If you wish to make requests regarding your personal information or should you have any questions about the contents of this Notice, please contact Human Resources at [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com).

- For California privacy requests, please use "California Privacy" in the subject line.
- For UK/EU privacy requests, please use "EU/UK Privacy" in the subject line.

## **UPDATES TO THIS NOTICE**

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We will not collect additional categories of information or use the Personal Information for materially different, unrelated, or incompatible purposes without providing notice.

We may update this Privacy Notice from time to time. If we make any substantive changes, we will notify you through email.

This Privacy Notice was last updated at the date stated at the top of it.