



**Revision date: June 2022**

## 1. Introduction

Avery Dennison Corporation, together with its subsidiaries and affiliates (collectively, "**Avery Dennison**", "**we**" or "**us**") has issued this Recruitment Privacy Notice (**'Notice'**) to describe how we use personal information of applicants (also referred to as "**you**") collected during our recruitment process. The term "**applicant**" refers to anyone who applies for employment, a role or who otherwise seeks to carry out work for us, whether permanent or temporary, and includes, consultants, contractors, volunteers, interns, casual workers, agency workers and employees. The term **personal information** or **information** refers to any information that can be used to (directly or indirectly) identify you. This Notice is a global notice and therefore applies to all applicants within the Avery Dennison group.

We respect your privacy rights and are committed to handling your personal information responsibly and in accordance with applicable law. This Notice explains what types of personal information Avery Dennison collects and uses about you, the purposes for which we use your personal information and the rights that you have in connection with these activities.

## 2. Types of personal information we process

In the course of applying for a job at Avery Dennison we will use personal information about you and your dependents, beneficiaries and any other individuals whose personal information you provide to us. We limit the information that we collect and use to what is necessary and permissible under applicable law. To the extent that we use personal information about individuals that you have provided to us (for example, information about your family members, dependents or beneficiaries), you should make those individuals aware of this Notice.

When you apply for a role, or when you submit your profile to us, we may collect and use the following information:

- Identification data - such as your name, gender, date of birth;
- Contact information - such as your physical address, postal address, email address, contact telephone numbers;
- National identifiers - such as a copy of your national ID/passport, nationality, immigration/visa status, or social security number;
- Health information - such as mental/physical health conditions. This information is only collected or used where it has been provided for public health or employment-related purposes (such as fitness for work, or in relation to reasonable adjustments for the workplace), or as otherwise permitted or required by law;
- Employment information - such as details of previous roles fulfilled by you, previous employers, companies you have worked for, locations, roles or job titles, duration of employment and accomplishments and references;
- Background information - such as academic/professional qualifications, resume/CV, memberships, certifications, and other supporting documents such as transcripts or copies thereof, but it may also include criminal records data (for vetting purposes, only where permissible and in accordance with applicable law);



- References about you and further information that may be shared by you during interviews or assessments;
- Details about any relatives, family or friends employed by us;
- Financial information - such as salary expectations, credit references, solvency or insolvency status;
- Any other information voluntarily provided or reflected in your resume/CV or cover letter, such as photographs, videos, or your social media account; and
- Cookies and device information. This includes the IP address of the device that you are using, the browser software you use, the date and time of access, the internet address of the website from which you link through to our website and information on how you use our website.

We offer you an option to submit a profile of yourself to be kept by us and used to contact you when suitable vacancies matching your profile become available. To activate this option, you will need to submit your resume/CV and become part of our talent community, or connect with us by using your job board or social media profile indicating your request. By doing so, we will have access to the personal information included in your resume/CV and reflected on your profile on one of these websites. Should you no longer wish to be a member of our talent community, you can unsubscribe through a link included in the emails at any time, or contact us by using the contact details included in Section 12.

Sensitive personal information includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union or political organization membership, or information about your health/sex life ("**Sensitive Personal Information**"). As a general rule, we do not collect or use any Sensitive Personal Information about you during the recruitment process, unless necessary for the purposes of equal opportunities monitoring, diversity, equity and inclusion, and complying with applicable laws including employment laws (such as information about your physical or mental condition to provide work-related accommodations).

### **3. Sources of personal information**

Usually you will have provided the personal information we hold about you, but there may be situations where we collect your personal information from a third party such as your friend, colleague or family member who referred your resume/CV to us or through a job agency. If we receive your information from another source, prior to using it, we will notify you of the fact that we received your information from another source and refer you to this Notice. For example, we may collect your personal information through the following sources:

- Certain background and other information from recruitment agencies, academic institutions, former employers, referees, background checking agencies and other third parties during your recruitment;
- Information on your education from academic institutions and training or certification providers;
- Information about your entitlement to participate in, or receive payments or benefits under, any insurance or pension scheme provided by Avery Dennison, from the relevant benefit provider; and
- Information from publicly available sources online – for example, where you have a



professional profile posted online (e.g., on your current employer's website, or on a professional networking site like LinkedIn).

In each of the above cases we will only collect and use such information where permissible and in accordance with applicable laws.

## **4. Purposes for which we use your information**

### *4.1 Recruitment purposes*

In general, we use your information for purposes related to the recruitment process which include:

- Facilitation of the entire application process, whether online or by hand;
- Keeping you informed on or contacting you about any suitable job opportunities where you have registered for job alerts or submitted your profile by connecting with us through your job board or social media profile;
- Determining your fitness for any roles, positions or jobs you have applied for and assessing your qualifications, experience, skills and background;
- Verifying your information and performing background checks to establish your suitability to the roles, positions or jobs you applied for;
- Responding to queries, requests and correspondence received from you and communicating with you;
- Providing you with updates on any changes that apply to you such as changes to policies and terms and conditions;
- Providing you with updates about your application;
- Carrying out administration tasks within the Avery Dennison group;
- Carrying out criminal background checks (if required for the role and permitted by law); and
- Managing the onboarding process.

### *4.2 Other legitimate business purposes*

We may collect and use personal information when it is necessary for other legitimate purposes. For example, for the purposes of filling an open position that matches your profile, for helping us conduct our business more effectively and efficiently, for business continuity purposes, for IT security/management, or for the facilitation of the sale, assignment or transfer of all or part of our business. We may also use your personal information to comply with our Code of Conduct and internal policies (e.g., Human Rights Policy), or to investigate violations of those policies.

The information collected through cookies are used to monitor the performance of our website and understand the usage of the website. These cookies help us manage any errors on our website and enhance the user experience. For further information, including the types of cookies that we use and how to manage your cookies settings, please consult our [Cookie Notice](#).



## 4.3 *Law-related purposes*

We may use your personal information when necessary for law-related purposes, including complying with our legal obligations (e.g., equal opportunities regulations, anti-discrimination laws) or under judicial authorization; exercising or defending legal rights of the Avery Dennison global group of companies; protecting the rights, property or safety of the Company, our employees, customers, suppliers or other persons; assisting in any disputes, claims or investigations relating to your application; or otherwise for the lawful operation of our business.

## 4.4 *Automated decision making and profiling*

We do not make decisions that are based solely on automated processing or profiling. We may, however, use an automated system that incorporates algorithms that assist us with matching candidates with job listings. For you as a candidate, this means that your job application may be processed and analyzed to identify your relevant skills, work and education history to determine how well your application corresponds with the requirements outlined in the job listing. The automated capabilities are used to support the recruitment process; however, final application review and hiring decisions are made by the Avery Dennison recruitment team.

## 5. **Related further processing of your information**

If you are accepted for a role at Avery Dennison, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Data Privacy Notice for Staff.

## 6. **Who we share your information with**

### 6.1 *Disclosure to other group companies*

We share your personal information with our Avery Dennison group companies. However, we only share (or allow access to) this information where such personal information is necessary for a legitimate purpose. This includes as necessary to enable that group company to perform its tasks and duties concerning: (i) administration of human resources; (ii) staff member compensation; or (iii) benefits at an international level; as well as for other legitimate business purposes such as IT services/security, tax and accounting and general business management.

### 6.2 *Disclosure to third party services providers*

We share your personal information with third parties who have been selected by Avery Dennison to provide us with services. Although the typical third party with whom we share information provides recruitment-related services to us, some third parties provide ancillary services, such as web hosting, cloud storing, or software. Personal information may be shared with:

- recruitment or executive search agencies involved in recruitment;
- background checking or other screening providers and relevant local criminal records



checking agencies;

- data storage, shared services and recruitment platform providers, IT developers and support providers and providers of hosting services in relation to our careers website; and
- third parties who provide support and advice including in relation to legal and financial matters, audits, management consultancy, insurance, health and safety, security and intel and whistleblowing or reporting issues.

### 6.3 *Disclosures to other third parties*

We may also disclose personal information to other third parties for legitimate business or law-related purposes, which may include:

- any competent law enforcement body, regulatory, government agency or court (including for tax, immigration, health and safety, national security or law enforcement purposes);
- an actual or potential buyer of all or part of our business in connection with the sale, assignment or other transfer;
- external auditors; and
- anyone else, with your consent.

Whenever we permit a third party to use personal information in order to provide us services, we implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

## 7. **Lawful basis for processing your personal information**

In the preceding Sections of the Notice, we have provided information about (i) the types of personal information we collect and the sources of information; (ii) for what purposes we use this information; (iii) and with whom we share your personal information. Depending on privacy and data protection laws we may be required to have legal basis for handling your personal information. This means that in addition to having a valid purpose, we also need a legal justification for handling your personal information.

We use your personal information for the purposes set out in this Notice and (where required by applicable law) under one of the following legal grounds:

- our use of your personal information is necessary for entering into a contract with you (where you have been successfully recruited);
- our use of your personal information is necessary for complying with our legal obligations;
- our use is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (as summarized in Section 4 above), where not overridden by your data protection interests or fundamental rights and freedoms;
- where necessary to protect your vital interests and physical safety or those of another person; or
- where we have your consent to do so.



Where we collect and handle Sensitive Personal Information it is solely:

- to comply with our legal or regulatory obligations, or to exercise specific legal rights;
- where necessary to protect your vital interests and physical safety or those of another person when consent cannot be given;
- when necessary for reasons of substantial public interest; or
- where you have given us your explicit and specific consent.

If we need to use your personal information for purposes relating to your future employment with us, or due to a statutory requirement, we will make this clear to you at the time. In such cases, failure to provide us with this information will prevent us from effectively administering our contractual relationship with you (including any related employment benefits) and/or complying with our legal obligations, which may mean we are unable to enter into an employment relationship with you.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in Section 12 below.

## **8. Transfer of personal information abroad**

Our affiliated companies and third party service providers that may process your personal information operate around the world. For example, we process our candidates' personal information through a global recruitment system. This may involve transferring your personal information to servers in the US. Our parent company in the US, Avery Dennison Corporation, may host these servers or utilize third-party servers.

If we transfer your personal information from the country in which you reside to a recipient that operates in a different jurisdiction, we will ensure that appropriate safeguards are in place to protect your personal information in accordance with this Notice. These safeguards include, but are not limited to:

- transferring your personal information on the basis of an 'adequacy decision' in respect of the recipient country. This means that a decision has been made by the applicable data protection authority confirming that the recipient country provides the appropriate level of data protection of personal information;
- implementing Standard Contractual Clauses as approved by the competent authorities; or
- the implementation of our Binding Corporate Rules for group members.

## **9. Data retention**

We will retain your personal information for as long as we need it to carry out the purposes described in this Notice or as otherwise permitted by applicable law. Generally this means your personal information will be retained until the end of the recruitment process. However, we may need to store your information for a period after the recruitment process in order to comply with applicable laws or to defend ourselves with regards to any disputes or claims.





Should we enter into an employment agreement with you, your information will be retained for that purpose and for the duration of your employment unless applicable laws require us to retain information for a longer period of time.

If we collected your personal information on the basis of your consent and you notify us of your decision to withdraw your consent, we will delete your information upon your request, unless we are permitted (or required) to retain it under applicable data protection laws. Further, the withdrawal of your consent will not impact our use of your personal information collected for other purposes when based on a different legal ground such as when it is necessary to use your personal information to enter into an employment contract with you.

## 10. Your data privacy rights

Depending on the applicable law, you may have certain rights in relation to the use of your personal information. When exercising your rights, note that the law may also require (or permit) us to balance your rights and your request to exercise them, against our rights and obligations to use your personal information, as well as the rights and freedoms of others.

We respond to all requests about personal information received from you about your personal information in accordance with applicable data protection laws and to the extent permissible under any other applicable laws.

In our recruitment portal SmartRecruiters, you have the opportunity to **access, correct, update** or **delete** your candidate profile. We encourage you to use this portal to ensure that your personal information is accurate and up to date. See [Annex A](#) for more information regarding the privacy rights in your country/region.

## 11. Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. When we update this Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will indicate at the top of the Notice when it was most recently updated. We encourage you to check the ad.a portal or our intranet page (Our World) periodically to review the most recent version of this Notice.

## 12. Contact details

Please note that the controller of your personal information is typically the Avery Dennison entity that you apply for a vacancy with, although your personal information may be shared with our affiliated companies as explained in this Notice.

If you have questions about this Notice, how we use your personal information, or your data protection rights, please email us at [dataprivacy@averydennison.com](mailto:dataprivacy@averydennison.com).