



Revision Date: October 2023

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1. Introduction

This Recruitment Privacy Notice ("**Notice**") for applicants describes how Avery Dennison Corporation, based at 8080 Norton Parkway Mentor, Ohio 44060, together with its subsidiaries and affiliates (collectively, "**Avery Dennison**", "**we**" or "**us**") process 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. Therefore, we have carefully drafted this Notice to inform you about our privacy practices



2. Types of personal information we process

In the course of applying for a job at Avery Dennison we will process 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 process the following information:

Personal Information	Categories of personal information we collect:	Purposes of collection
Personal Identifiers Identification	Name, date of birth, age, gender, nationality.	Recruitment Purposes, Health and Safety Purposes, Law-Related Purposes, Corporate Transaction Purposes, IT and IT Security Purposes, and Legitimate Business Interest Purposes.
Government Identifiers Information	National ID/passport, work permits, immigration/visa status, social security numbers	Recruitment Purposes, Health and Safety Purposes, Law-Related Purposes, Corporate Transaction Purposes, and Legitimate Business Interest Purposes.
Contact Information	Home and business address, telephone/email addresses, emergency contact details	Recruitment Purposes, Health and Safety Purposes, Law-Related Purposes, Corporate Transaction Purposes, and Legitimate Business Interest Purposes.
Characteristics of protected classifications	Gender, age, nationality, race/ethnicity, citizenship, and health and medical information (including but not limited to, observations, inquiry responses and testing results).	Recruitment Purposes, Health and Safety Purposes, Law-Related Purposes, Corporate Transaction Purposes, and Legitimate Business Interest Purposes.
Family Information	Details about any relatives, family or friends employed by us.	Recruitment Purposes, Law-Related Purposes, and Legitimate Business Interest Purposes.
Internet or other electronic network activity information	IP addresses, log files, login information, and cookies and device information (e.g. online activity such as date and time of accessing our websites, website addresses accessed, the length of website visit)	IT and IT Security Purposes, and Legitimate Business Interest Purposes.



Audio, electronic, visual information	Photographs and videos.	Photos and videos are processed when voluntarily submitted to us via the recruitment process (e.g. on CV's).
Recruitment information	Employment history - previous roles, previous employers, companies you have worked for, locations, roles or job titles, duration of employment and accomplishments.	Recruitment Purposes, Law-Related Purposes, Corporate Transaction Purposes, and Legitimate Business Interest Purposes.
	Reference and background information, and information obtained from criminal background checks	As necessary in connection with the following Recruitment Purpose: <ul style="list-style-type: none"> - For vetting/screening, to the extent permissible and in accordance with applicable law Corporate Transaction Purposes.
Financial information	Banking details, tax information, withholdings, salary, benefits, expenses, company allowances, equity and other long-term incentive grants.	Recruitment Purposes, Law-Related Purposes, Corporate Transaction Purposes, and Legitimate Business Interest Purposes.
User Account Information	Publicly available sources - Social media information	Recruitment Purposes.
Information related to academic Background	Academic/professional qualifications, education and CV/résumé, memberships, certifications and other supporting documents such as transcripts or copies thereof	Recruitment Purposes, Law-Related Purposes, and Corporate Transaction Purposes.

Sensitive Personal Information includes any Characteristics of Protected Classifications described above, namely 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 and sexual orientation. In certain jurisdictions, sensitive personal information encompasses an individual's social security number, driver's license, state ID, passport number, financial account, debit or credit card number, precise geolocation, mail, email, message contents, and marital status.

As a general rule, we only collect or use any Sensitive Personal Information about you for 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).

When you submit a job application, we offer you the opportunity to join our Talent Community (a system consisting of targeted talents who can meet current and future hiring needs). You will receive an invitation to join the Talent Community, or you can express your interest by [completing a form](#). Your information will be stored and processed to notify you when there is a suitable vacancy matching your profile. If you no longer wish to be a part of our Talent



Community, you can easily unsubscribe by clicking the link provided in the email or [contacting us](#) directly.

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. 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 website 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 process your information

Recruitment purposes

In general, we use your personal 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, joined our talent communities or submitted your profile by connecting with us through your job board or social media profile;
- Sending you campaign emails with company news, relevant updates and new career opportunities while tracking your engagement with the campaign's content to improve our communication;
- 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.

Other legitimate business purposes

When necessary, we collect and use personal information for other legitimate purposes, which includes finding an open position that matches your profile, helping us conduct our business more effectively and efficiently, ensuring business continuity, managing IT security, or facilitating 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](#).

Law-related purposes

When necessary, we use your personal information 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.

Health and Safety Purposes

In order to guarantee your well-being and protection, along with safeguarding your property or to contact your spouse, dependents, or other emergency contacts during an urgent situation, we may need to gather your personal information.

Corporate transaction Purposes

In the event that all or part of our business is sold, assigned, or transferred to another entity, or if any form of restructuring takes place, we may need to process your personal data to facilitate these actions.

IT & IT Security Purposes



We may process your data to provide IT support, maintain the security and functionality of our websites, systems and applications, and conduct security screenings (to the extent permitted by law).

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, which will be provided to you.

6. Who we share your information with

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.

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. The categories of personal information that we disclosed to third parties who are considered “service providers” or “contractors” (each, as defined under California law) in the prior 12 months includes the following:

- Personal identification information such as real name, postal address, online identifier, and email address;
- Government Identifiers Information such as national ID/passport, work permits, immigration/visa status, social security numbers;
- Characteristics of protected classifications, such as the gender, age, nationality, race/ethnicity, citizenship;
- Recruitment information, such as employment history and reference and background



information;

- Education information, such as academic/professional qualifications, education and CV/résumé.

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.

We disclose the above listed information to the categories of above listed [parties](#) for the purposes set forth in this Notice, including, without limitation, the “[Purposes for which we use your information](#)” section above.

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, when necessary and subject to your prior 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:

- when necessary for entering into a contract with you (where you have been successfully recruited);
- when necessary for complying with our legal obligations;
- when necessary for the purposes of our legitimate interests or the legitimate interests of a third party (as summarized in “[Purposes for which we process your information](#)”



section above), where not overridden by your data protection interests or fundamental rights and freedoms;

- when necessary to protect your vital interests and physical safety or those of another person in emergency situations; or
- when we have your prior consent to use your personal information.

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 for assessing your working capacity or for the purposes of providing health and social care or treatment as required by Law;
- 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 this notice.

8. Transfer of personal information abroad

Our affiliated companies and third party service providers that may process your personal information operate around the world. We process our candidates' personal information through a global recruitment system. If you are located outside the US, your personal information might be transferred to our US-based servers. 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 or the competent body 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 collect 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

The rights pertaining to your personal information are governed by the legal frameworks in place in the jurisdiction in which you reside. Given our global presence, the specifics regarding these rights may vary. This section aims to provide a broad overview of the rights you might have in relation to the personal information we collect and process. We encourage you to consult [Annex A](#) for more information regarding the privacy rights in your country/region. When exercising your rights, also 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.:

Global Rights Overview:

Right of access to your personal information

You have the right to ask us whether we hold any of your personal information and to provide you with a copy of any personal information we hold about you.

Right to rectify your personal information

You have the right to request us to correct any inaccuracies in your personal information and to modify it in such a way if you believe the personal information we hold is incomplete or inaccurate.

Right to erasure your personal information

You have the right to request us to delete your personal information, provided that there are



no other valid grounds that justify, under the applicable laws, the preservation of your personal information.

Right to restrict processing of your personal information

You have the right to request us to restrict the processing of your information in certain circumstances.

Right to data portability

You have the right to ask us to let you have a portable copy of the personal information we hold about you in certain circumstances.

Right to object processing of your personal information

You have the right to ask us to stop processing any of your personal information that we process based on our legitimate interests in certain circumstances.

Right to opt out of marketing communications

You have the right to opt out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you or by contacting us.

Right to opt out of sales

You have the right to request that we stop selling or sharing your personal information (“opt-out”), including via a user-enabled global privacy control.

Right to withdraw your consent

You have the right to withdraw your consent at any time in the cases where we have collected and processed your personal information based on your consent. Note that withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Non-Discrimination

You have the right to be free from unlawful discrimination for exercising your rights. We do not discriminate based on an individual’s exercise of the rights granted to them under the applicable data protection laws.

Right to lodge a complaint

You also have the right to lodge a complaint with a data protection authority about our collection and use of your personal information or the right to an effective judicial remedy if



you consider that your rights have been infringed.

Exercising your rights

If you wish to exercise any of these rights, please contact us at dataprivacy@averydennison.com. You can also exercise any of your privacy and data protection rights by filling out our [Data Subject Access Rights form](#). 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. Selling or Sharing Personal Information

We do not sell your personal information to third parties, nor do we share your information for purposes of cross-contextual behavioral advertising as defined under the CPRA. In the event we begin selling personal information (1) this Notice will be updated to reflect that fact and you will be notified of such update and (2) if required under the CPRA, you will be provided the ability to opt out of the sale of your personal information or the sharing of your personal information for cross-contextual behavioral advertising purposes (as may be applicable).

12. Access by children

Our data collection done pursuant to this Notice, is not directed at children under 16 years of age. We do not knowingly collect or use information from children under 16 in our data collection practices under this Notice.

13. 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.

14. How to contact us

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.